### RECEIVED FEDERAL ELECTION COMMISSION

### BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)		2014 JUN 24	PM 1: 32
	)	<b>MUR 6786</b>		
The National Republican Congressional Committee	)		OFFICE OF	GENERAL
And Keith Davis, as Treasurer	j		COUP	SEL

# RESPONSE OF THE NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE AND KEITH DAVIS, AS TREASURER, TO THE COMPLAINT

This responds on behalf of our clients, the National Republican Congressional Committee ("NRCC"), and Keith Davis, as Treasurer (collectively, the "Respondents"), to the notification from the Federal Election Commission ("Commission") that a complaint was filed against them in the above-captioned matter. The complaint was filed by the Atlantic County Democratic Committee ("Complainant"), and is legally deficient because it misstates the law and is nothing more than a baseless, sensationalized attack that has no merit. For the reasons set forth here and as fully explained below, Complainant's allegations are without merit because:

- The website carried both the FEC and IRS disclaimers identifying the NRCC as the entity paying for the website and as the recipient of any contributions made via the webpage.
- The attack microsite was clearly oppositional, designed to defeat the candidate, Bill Hughes, Jr., and populated with content that attacked him. As such, the website squarely falls under the opposition exception at 11 C.F.R. § 102.14(b)(3) for any project that "clearly and unambiguously shows opposition to the named candidate."
- The communications made via the attack microsite webpage are protected core political speech made by a political party expressing opposition to a political candidate and protected by the First Amendment.

Accordingly, the Commission should find no reason to believe that Respondents violated the Federal Election Campaign Act of 1971 (the "Act"), or Commission regulations, dismiss the matter, close the file, and take no further action.

### Introduction

The Act and Commission regulations have long prohibited the use of candidate names in unauthorized committees, as well as supportive project titles. The Commission's concern stems from attempts to profit off of intentional confusion created by committees and projects "supporting" the candidate it names, while contributions in fact go to other entities rather than the candidate's committee. Using candidate names in unauthorized committee names or supportive projects can create confusion and lead a candidate's supporters into thinking their contribution to the unauthorized committee is actually going directly to the candidate, when indeed it is not. However, as the Commission has previously stated, the same danger of confusion is not present with respect to projects that clearly oppose the identified federal candidate. The 1994 Explanation and Justification regarding the regulation ("E&J") makes clear that the risk of confusion inherent in supportive projects is not there for projects that obviously oppose the candidate named.

In the context of candidate-opposition projects, the First Amendment demands that the Commission not second-guess the manner in which a committee chooses to express the reasons for its opposition to the candidate and deliver relevant opposition research about the candidate opposed to the voting public. This protection also extends to requests for donations by the committee for funds to oppose and defeat the candidate. Accordingly, the Commission must find no reason to believe, dismiss the complaint, take no further action, and close the file.

#### Discussion.

I. Any fair and objective review of the website referenced in the complaint will reveal that it was created, designed and populated with content expressing clear opposition to the Democratic candidate who was the focus of the website.

Starting in August 2013, the NRCC launched a number of websites it termed "attack microsites" against Democratic candidates for Congress.\footnote{1} The sites, while differing in content and design, uniformly contain negative information about the Democratic candidate they focus upon in an attempt to counter deceptive spin and rhetoric by the Democratic campaigns themselves. The launch of the websites was accompanied by numerous NRCC press releases and press statements from the NRCC communications team, announcing the existence and purpose of these attack microsites as, as one press release described it, an opportunity for "voters [to] learn the truth about these two-faced politicians." Press Release, NRCC, New NRCC Campaign Targets "Red Zone" Democrats with Microsites (Nov. 6, 2013), available at https://www.nrcc.org/2013/11/06/new-nrcc-campaign-targets-red-zone-democrats-microsites/. The Hill covered the launch of a number of the "attack sites" against Democratic incumbents in November 2013, noting that "each includes details on the candidates' voting history and Republican attack line" and "all provide the option for a user to donate to the NRCC and sign up to the committee's mailing list." NRCC hits top Democratic targets with attack microsites, The Hill, Nov. 6, 2013, http://thehill.com/blogs/ballot-box/189382-nrcc-hits-top-dem-targets-with-attack-microsites.

The attack website targeting Bill Hughes, Jr., Democrat candidate for New Jersey's 2<sup>nd</sup> Congressional District, was posted August 21, 2014 at billhughesjrforcongress.com. Besides the "donate"/"contribute," "home" and "submit" buttons, disclaimers, and the web address in a portion of a graphic, every sentence or component of the site expresses opposition to Hughes's candidacy. The background of the website is a picture of a man's hands in handcuffs. The graphic at the top of the page reads in full: "Need to get out of jail? 'Better Call Bill!' Bill Hughes Jr. BILLHUGHESJRFORCONGRESS.COM," followed by "Helping New Jersey's most corrupt

There is nothing new or unusual about this strategy. The NRCC websites at issue are part of a trend of oppositional webpages sponsored by political parties, campaigns, or other speakers that seek to correct the record concerning positive claims about an opponent.

criminals since 2002." In addition to the obviously oppositional language and imagery, the following represents the remaining text of the attack microsite:

After a career of making big money trying to keep some of New Jersey's most powerful and corrupt criminals out of prison, Bill Hughes Jr. now wants to take his act to the halls of Congress.

- Represented a former casino host who pled guilty to participating in an interstate racketeering ring.
- Represented a client who pled guilty to falsifying tax returns in a large tax fraud scheme.
- Represented a client who pled guilty to participating in a large internet credit card fraud and criminal copyright network.

In addition to the website's oppositional content, it included the required "paid for by" disclaimer, clearly and conspicuously visible in a box. The disclaimer reads: "Paid for by the National Republican Congressional Committee and not authorized by any candidate or candidate's committee. www.nrcc.org." In other words, the disclaimer identifies the NRCC as the entity paying for the site — twice — and indicates it was "not authorized" by any candidate. In addition, the NRCC further included the IRS disclaimer on the main webpage indicating that "Contributions to the National Republican Congressional Committee are not deductible as charitable contributions for Federal income tax purposes," as well as on any contribution page.

Any reasonable examination of the website — including the NRCC's media announcements, and even the complaint's own description of it — leads to the conclusion that the attack microsite is clearly designed to encourage defeat of Bill Hughes, Jr. and, therefore, qualifies for the opposition exception in 11 C.F.R. § 102.14(b)(3).

As illustrated above, there can be no mistaking the oppositional nature of the website.

Every sentence in the site clearly expresses unmistakable opposition to the candidate named. Above the means to contribute or sign up with the NRCC is large-print text informing the viewer that Bill Hughes, Jr. has been "Helping New Jersey's most corrupt criminals since 2002." As the website is oppositional in nature, it qualifies for the exception for a project that "clearly and unambiguously shows opposition to the named candidate." § 102.14(b)(3)

a. The regulations regarding use of candidate names guard against use in committee names and projects purporting to support candidates; the rules create a carve-out for opposition projects like the NRCC's attack microsite since the concerns about confusion are absent in clear opposition projects.

The prohibition on the use of candidates' names in unauthorized committee names and the names of supportive special projects at § 102.14 reflects the Commission's concern about confusion stemming from committees or supportive projects. The Commission expressed its concern that supportive fundraising projects may adversely affect the candidate's campaign committees and contributors who make contributions believing they are supporting a candidate, when in fact, they're supporting a completely different committee.

The regulation stems from 2 U.S.C. § 432(e)(4), a section of the Act that prohibits using candidate names in the name of an unauthorized committee. In 1992, when the Commission expanded the committee name prohibition to "any name under which a committee conducts activities, such as solicitations or other communications, including a special project name or other designation," the Commission explained that it "has become increasingly concerned over the possibility for confusion or abuse" of the use of candidate names in special projects. 57 Fed. Reg. 31424, 31424 (July 15, 1992) [hereinafter "1992 E&J"]. The 1992 E&J also followed Common Cause & FEC, 842 F.2d 436, a case concerning an unauthorized committee's inclusion of Ronald Reagan's name in projects soliciting money in his name—including on letterheads and return addresses—and even asking for contributions by checks made payable to accounts bearing Reagan's name including "Americans for Reagan," "Citizens for Reagan in 80" and "Ronald Reagan Victory Fund." The 1992 E&J focused on specific complaints by authorized presidential candidate committees in the 1998 election who suffered the same problem as Reagan in 1980 and explained that unauthorized projects had raised \$10 million during the 1988 presidential campaign using one candidate's name, and \$4.4 million using two others', though the money never went to the candidates' committees.

But the 1992 amendment was quickly followed up by an important carve-out for projects clearly indicating opposition to candidates. Both the 1992 and the 1994 E&Js indicate the Commission's concern with use of candidate names in project titles is with respect to situations where support of a candidate leads to confusion about whether contributions go to the candidate's committee or an unauthorized committee. After all, the justification for the 1992 rulemaking was solely based on these supportive projects. The 1994 carve-out for uses of candidate names in projects that clearly indicate opposition to the named candidate reflects this distinction. In it, the Commission clearly explained that, while there was a serious risk of confusion when unauthorized committees use candidate names as part of an effort to support the named candidate, the successful petitioner argued and the Commission cited, "There is no danger of confusion or abuse inherent in the use of a candidate's name by a committee or project which opposes the candidate." The E&J indicates that "The Commission recognized that the potential for fraud and abuse is significantly reduced in the case of such titles, and has accordingly revised its rules to permit them." 59 Fed. Reg. 17267, 17269 (Apr. 12, 1994) (hereinafter "1994 E&J").

Since the attack microsites at issue here are clearly oppositional, they are not the sorts of communications the Commission was concerned about when writing § 102.14 in 1992, and they are precisely the types of communications for which the Commission recognized the need to create an opposition exception in 1994.

b. Further, the NRCC's website is not operated under a "name under which a committee conducts activities" other than the "National Republican Congressional Committee" or "NRCC" and neither the website's address nor a single graphic constitutes the title of a special project.

Today's § 102.14 requires that, except for one that "clearly and unambiguously shows opposition to the named candidate," "no authorized committee shall include the name of any candidate in its name" and "name' indicates any name under which a committee conducts activities.

such as solicitations or other communications, including a special project name or other designation."

On its face, the regulation specifically indicates the "name" at issue is "any name under which the committee conducts activities." But the phrase is only further explained as "such as solicitations or other communications, including a special project name or other designation." The Commission's 1992 and 1994 E&J responses to the *Common Cause* case and the follow-up thereto make exceedingly clear that the regulation sought to prevent confusion caused by deceptively structured supportive fundraising projects that purported to support the candidate in name but that did not benefit the candidate in the end.

But here the NRCC's website is conducted in its own name, not any other. There is no "name" or "title" of the project; no solicitations were made in a "name" or "title" other than the NRCC's name. The accompanying media campaign promoting the website was done solely in the name of the NRCC, as illustrated by its press releases and blog posts. The disclaimers clearly and prominently identify the NRCC as the entity paying for the websites and receiving the contributions. If there was a name at all for any of the websites, which is unlikely, it is simply the NRCC's itself.

Contrary to the complaint's assertion, the Commission has never indicated that any single component of a website itself comprises the title of a project, and has certainly never determined that the web address or URL constitutes a title. In fact, the Commission has never defined what the title of a special project would be, let alone what the "title" or "name" of an internet website would be. A 1995 Advisory Opinion, AO 1995-9 (NewtWatch), indicated that the operation of NewtWatch's website, which the committee described as "a forum for publicly available

<sup>&</sup>lt;sup>2</sup> By no means is it clear that a website itself even constitutes a "special project," let alone that any particular website content constitutes the name of one. In their Statement of Reasons in MUR 6399, Commissioners Hunter, McGahn, and Peterson expressed skepticism that a congressional campaign's operation of an opposition website comprised of its opponent's name was a "special project." See Commissioners Hunter, McGahn, and Peterson, Statement of Reasons, MUR 6399, at 5 n.16 (assuming only "arguendo" that the website was a special project).

information" that "exists principally as a 'virtual PAC' on the World Wide Web," would be a special project. AO 1995-9 at 1. But importantly, in that Advisory Opinion, the requester had specifically supplied and designated that title to the Commission in its request; the Commission did not determine that "NewtWatch" was the name or title of the website based on a URL or a heading—or any other factor. In fact, the URL cited was "http://www.cais.com/newtwatch". AO 1995-9 at 1. Any attempt to re-write the Advisory Opinion on this issue is refuted by the fact that in the Statement of Reasons of Commissioners Hunter, McGahn, and Peterson in MUR 6399 confirmed that "No Commission precedent supports the notion that an unauthorized committee's web address constitutes the title of a special project. Advisory Opinion 1995-09 (NewtWatch) . . . merely establishes that a website operated by an unauthorized committee can be considered a committee special project that is subject to the naming requirements in 11 C.F.R. § 102.14(b)(3). The opinion makes no statement that the site's web address is the project's title. (And even if it did, an advisory opinion cannot establish a new rule but only provides protection to a requester against potential liability. See 2 U.S.C. § 437h(b))." Commissioners Hunter, McGahn, and Peterson, Statement of Reasons, MUR 6399, at 5 n.16.

This is consistent with the Commission's rejection of the General Counsel's Report in MUR 6399 and the MUR 6399 Statement of Reasons where three Commissioners (the majority of those voting on the matter) agreed that "the 'name under which [the] committee conduct[ed] its [website] activities' was the name on the disclaimers. . . not the website URL." Commissioners Hunter, McGahn, and Peterson, Statement of Reasons, MUR 6399, at 5 n.16 (alteration in original). Further, if it were the case that a URL constituted a project's title, any use of a candidate's name in a long string of URL language could be swept into the regulation. This would effectively disallow any

Moreover, any attempt to rely on the Office of General Counsel's Report in MUR 6399 (Yoder for Congress) — a Report that was rejected by the Commission, which declined to find reason to believe and closed the file — and attempt to pick and choose among various factors that supported the closing of the matter to explain why it did so belies the fact that no actual Commission precedent supports the notion that a website's URL is a special project's title.

webpage on a larger website from bearing a candidate's name, regardless of whether it was a separate project or "name under which the committee conducts activities," and meaning any number of candidate or political party websites would be in violation of this regulation at any time.

Importantly, this approach is also consistent with the recent dismissal of combined MURs 6633, 6641, 6643, and 6645, which considered whether a number of projects purportedly supporting Representative Allen West, candidate for Congress, violated the Act and regulations. The MUR, in part, deals with CAPE PAC's website, "votewest2012.org" which contained "a stylized logo 'Allen West for Congress 2012" in the upper left hand corner and at the bottom left of the screen. First General Counsel's Report, MURs 6633, 6641, 6643, 6645, at 8. "It also includes photos of the candidate, and descriptions of West's positions on various issues." Id. Despite the fact that the site was in support of the candidate it named in both the upper portion of the website and in the web URL, the Commission determined that the various disclosures on the website, including the disclaimer, provided sufficient notice that contributions made via the site did not go to West's committee, and neither CAPE PAC's website nor a number of other fundraising projects and communications in support of West violated the Act. In fact, though "[t]he record leaves little doubt that the Respondents sought to use Representative West's likeness to raise funds independently to support his candidacy" and "Respondents spent very little of the money they raised to support West," there was no reason to believe that the Respondents violated the Act or regulations. Id. at 2.

Though the complaint cited 11 C.F.R. § 110.11 and 110.16(b) rather than § 102.14, the

Office of General Counsel's ("OGC's") analysis is instructive here because the intent behind the two
regulations is entirely consistent: preventing confusion between authorized candidate committees
and unauthorized committees. In the consolidated MURs, OGC concluded and the Commission
agreed that the disclaimers and various notices in the supportive communications overrode the use

of the candidate's name, likeness, stylized logos, or other exhortations in the name of the candidate. In fact, the Commission's dismissal of the consolidated MURs is even more remarkable given that each of the communications expressed support of West — precisely the sorts of communications the Commission is most concerned about under § 102.14. The NRCC's sites, on the other hand, clearly express opposition, which the Commission recognizes is less of a concern for confusion or abuse based on the use of a candidate's name. Any finding of reason to believe the NRCC's attack microsite was in violation of the Act or the regulations would be wildly inconsistent with the Commission's decision in MURs 6633, 6641, 6643, and 6645.

III. The FEC cannot make itself the arbiter of what constitutes an "acceptable" opposition website containing core political speech, especially when there is no doubt about the website's purpose as with the NRCC website at issue here.

Under the federal judiciary's First Amendment jurisprudence, the Commission cannot engage in burden shifting by placing the NRCC in the position of proving that the attack microsite opposing a Democratic federal candidate falls within the clearly applicable opposition project exception at 11 C.F.R. § 102.14(b)(3). Any analysis of the NRCC website must begin from the standpoint that the website contains protected political speech and is not subject to regulation. See FEC v. Wisconsin Right to Life, 127 S. Ct. 2652, 2674 (2007). The Commission bears the burden of proving that a particular website runs afoul of § 102.14, a burden it cannot carry based upon the clear facts demonstrating that the website opposed the Democratic federal candidate, Bill Hughes, Jr., referenced in the attack microsite, and thus falls outside the ambit of the regulation. In fact, any doubt concerning the meaning of a phrase or word contained in one of the NRCC attack microsites must be resolved in favor of a finding that the website qualifies for the opposition exception at § 102.14(b)(3). Id. at 2669 ("Where the First Amendment is implicated, the tie goes to the speaker,

not the censor."); id. at 2667 ("In short, it must give the benefit of any doubt to protecting rather than stifling speech.").4

In addition, the Commission cannot misconstrue an NRCC attack microsite that contains words and phrases opposing a Democratic federal candidate as some type of "subtle" or effective ploy to trick Democratic supporters. Each website must be evaluated based upon a plain review of the website's content. The Commission cannot supply a meaning to words or phrases that is incompatible with the clear import of the actual words. Cf. FEC v. Furgatch, 807 F.2d 857, 863-64 (9th Cir. 1987) ("context cannot supply a meaning that is incompatible with, or simply unrelated to, the clear import of the words"). Therefore, the OGC and Commission undeniably are cabined by the First Amendment and may not use context or other open-ended factors as vehicles to characterize a genuine opposition website as a subtle or effective ploy to trick Democratic supporters of the Democratic federal candidate attacked in the website when such a characterization is not supported by a four-corners analysis of the website itself. See N.C. Right to Life, Inc. v. Leake, 525 F.3d 274, 284 (4th Cir. 2008) ("This sort of ad hoc, totality of the circumstances-based approach provides neither fair warning to speakers that their speech will be regulated nor sufficient direction to regulators as to what constitutes political speech.").

#### .Conclusion

For all of the reasons stated above, there is no factual or legal basis for finding reason to believe a violation occurred in this matter. See Commissioners Wold, Mason, Thomas, Statement of Reasons, MUR 4850 ("A mere conclusory accusation without any supporting evidence does not

The Commission must not use the enforcement action to make new rules concerning these activities. The proper vehicle is to initiate a rulemaking that satisfies the Administrative Procedure Act's notice and comment requirements. To do otherwise would violate Respondent's Due Process rights and the principles of fundamental fairness and interpret the regulation in a manner that makes it vulnerable to a constitutional challenge. See FCC v. Fox, 132 S. Ct. 2307, 2317–2319 (2012); see also Arizona v. Inter Tribal Council of Arizona, Inc., 133 S. Ct. 2247, 2259 (2013) ("we think that—by analogy to the rule of statutory interpretation that avoids questionable constitutionality—validly conferred discretionary executive authority is properly exercised . . . to avoid serious constitutional doubt.").

shift the burden of proof to respondents. . . . The burden of proof does not shift to a respondent merely because a complaint is filed."); Commissioners Mason, Sandstrom, McDonald, Smith, Thomas, Wold, Statement of Reasons, MUR 5141 ("A complainant's unwarranted legal conclusions from asserted facts, will not be accepted as true."). Also, the complaint's speculative accusations are not a sufficient basis for finding reason to believe — especially in light of the evidence included with this reply. Commissioners Mason, Sandstrom, Smith, Thomas, Statement of Reasons, MUR 4972 ("Mere speculation will not support an RTB finding."); Commissioners Mason, Sandstrom, Smith, Thomas, Statement of Reasons, MUR 4960 ("Such purely speculative charges, especially when accompanied by a direct refutation, do not form an adequate basis to find reason to believe that a violation of the FECA has occurred.").

Accordingly, we respectfully request that the Commission dismiss the complaint, close the file, and take no further action in this matter.

Respectfully submitted,

**IONES DAY** 

51 Louisiana Avenue, NW Washington, DC 20001

P: (202) 879-3939

F: (202) 626-1700

June 24, 2014

# **EXHIBIT A**





- · About (http://www.nrcc.org/about/)
- · Blog (http://www.nrcc.org/blog/)
- · Videos (http://www.nrcc.org/videos/)
- · Store (https://www.nrcc.org/store/)
- · Contribute (https://www.nrcc.org/contribute/)

## Blog

f SHARI

(http://www.facebook.com/sharer.php?u=http%3A%2F%2Fwww.nrcc.org%2F2014%2F02%2F05%2Flatest-nrcc-web-campaign-largets-nancy-

asi-new-microsite%2F) shares



(Initp://twitter.com/shara?uri=http%3A%2F%2Fwww.nrcc.org%2F2014%2F02%2F05%2Flatesi-nrcc-web

npaign-largets-nancy-palosi-new-microsite%2F6text=Latest%20NRCC%20Wob%20Campaign%20Targets%20Nancy%20Pelosi%20With%20New%

Vicrosite&via=nrcc) tweets

tp://www.nrcc.org/catagory/blog)

atest NRCC Web Campaign Targets Nancy Pelosi With New Microsite NRCC

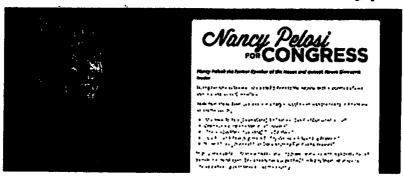
tp://www.nrcc.org/author/admin/) | February 5th, 2014

On NancyPelosi2014.com (http://nancypelosi2014.com/), Voters Can See The Risk
Of Putting Her Back In The Speaker's Chair

ASHINGTON – As part of a new and ongoing microsite campeign this cycle, the National Republican Congressional Committee is leunching a web site today highting Nancy Pelosi's destructive record —so voters can learn just how high the cost will be if Democrats regain the majority in the House. The site will show voters tosi's real record and provide a stark contrast to her own campaign web site.

th NancyPelosi2014.com (http://nancypelosi2014.com/), voters from across the country will be able to see Pelosi's history of crafting ObsmaCare, adding trillions in oil, and making outrageous statements. Today, the committee is also launching a similar site on Pelosi ally and Colorado congressional candidate Andrew Romanoff. e Pelosi's site, AndrewRomanoff2014.com (http://andrewromanoff2014.com/) will inform Colorado voters on his history of raising taxes and supporting ObsmaCare.

ce the others, these new sites make it clear how big the stakes are this November," said NRCC Communications Director Andree Bozek. "With Nancy Pelosi and rack Obama in control of Washington, we saw record debt, a falled stimulus, and the disaster that is ObamaCare. We're not going back."



(p://nancypelosi2014.com/)

Addition To The Pelost and Romanoff Sites, The NRCC Previously Launched The Following:

John Tierney (MA-08)

John Tismey for Congress (http://www.johntlerney2014.com/)

Sean Eldridge (NY-19)

Sean Eldridge for Congress (http://www.seaneldridgeforcongress2014.com/)

John Lewis (MT-AL)

John Lewis for Congress (http://johnlewis2014.com/)

Amanda Renteria (CA-21)

Amanda Ronteria for Congress (http://amandarenteriaforcongress.com/)

Nick Rahall (WV-03)

Nick Rahall for Congress (http://rahallforcongress.com/)

Bill Hughes (NJ-02)

Bill Hughes Jr. for Congress (http://www.billhughesjrforcongress.com/)

Alex Sink (FL-13)

Alex Sink for Congress (http://www.sinkforcongress2014.com/)

John Barrow (GA-12)

John Barrow for Congress (http://www.johnbarrow2014.com/)

Ron Barber (AZ-02)

Ron Barber for Congress (http://www.ronbarber2014.com/)

Ann Kirkpatrick (AZ-01)

Ann Kirkpatrick for Congress (http://www.annikirkpatrick.com/)

Kyrsten Sinema (AZ-09)

Kyrsten Sinema for Congress (http://www.sinemaforcongress.com/)

Collin Peterson (MN-07)

Collin Peterson for Congress (http://www.collinpeterson2014.com/)

Martha Robertson (NY-23)

Martha Rebertson for Congress (http://www.martha-robertson.com/)

Annie Kuster (NH-02)

Annie Kuster for Congress (http://www.anniekusterforcongress.com/)

Carol Shea Porter (NH-01)

Carol Shea Porter for Congress (http://www.sheaporterforcongress.com/)



(https://www.nrcc.org/store/reagan-bush-84-campaign-shirt/?

n\_source=nrccsidebar&utm\_medium=website&utm\_cumpaign=fteaganBushShirt\_sidebar\_s\_v1)

#### ending



(http://www.nrgc.org/2014/05/13/one-glf-house-democrat-will-remind-good-hygiene/)Watch

is Damocral Congressman Eat His Earwax (http://www.nrcc.org/2014/05/13/one-gli-house-damocrat-will-remind-good-hygtene/)



(http://www.n.cc.org/2014/05/12/nroc-announces-tirst-round-young-gun-candidates/)NRCC

nounces. First flound at Young Gun. Geneticales (fillp://www.nicc.org/2014/05/12/nrcc-announces-first-round-young-gun-candidates/



(http://www.nrcc.org/2014/05/07/latest-story-epa-porn-watching-employoe-outrageous/)This

lesi Story About What The EPA Did To its Porn-Watching Employee is Outregeous (http://www.nrcc.org/2014/05/07/latesi-story-epa-porn-watching-employee irogeous/)



(http://www.nrcc.org/2014/06/06/cne-headline-shows-exactly-whats-stake-november/)This One

adline Shows Exactly What's At Stake in November (http://www.nrcc.org/2014/05/08/one-headline-shows-exactly-whate-stoke-november/)



(http://www.nrcc.org/2014/05/13/8-tweets-show-switzl-day-damocrats/)Here Are 10 Tweets

al Sliow What An Awful Day Democrata Are Hoving (http://www.nrcc.org/2014/05/13/8-twoots-show-awful-day-democrats/)



(http://www.nrcc.org/2014/05/13/nrcc-memo-west-virginia-primary-results-2/)NRCC Memo:

ist Virginia Primary Results (http://www.nrcc.org/2014/05/13/nrcc-memo-west-virginia-primary-results-2/) lps://www.racebook.com/NRCC) (https://wiiter.com/NRCC/) (http://www.youtube.com/user/TheNRCC/leatured)

CONTRIBUTE (https://www.nrcc.org/contribute/)



(http://www.nrcc.org/nome)

320 Firet St., SE Washington, DC 20003 Privacy Policy (http://www.nroc.org/privacy-policy): | Contact Us (http://www:nroc.org/contact)

Copyright © 2014. All Rights Reserved.

- Blog (http://www.nrcc.org/blog/).
- Biog (dafault) (http://www.nrcc.org/category/blog/)
- Press Releases (http://www.nrcc.org/category/press-release/)
- Rapid Response (http://www.nrco.org/category/rapid-response/)
- Polling Memos (http://www.nrcc.org/category/polling-memos/)
- · Photos (http://www.nrcc.org/category/photo/)
- Videos (hillo://www.firec.org/caledbry/video
- hiem Application (http://www.inco.org/intern.applic
- Digital Internatio (http://www.nrcc.org/digital-Internation
- Membership (http://www.nrcc.org/membership/
- Sustaining Members and Chairman's Counc
- Speaker's Circle
- Steering Committee (http://www.nrcc.org/membership/steering-committee/)
- . Chairman's Club (http://www.nrcc.org/membership/chairmans-club/)
- House Council (http://www.nrcc.org/membership/house-council/)
- Congressional Forum (http://www.nrcc.org/membarship/congressional-forum/)

Videos (http://www.nrcc.org/videos/)

#### Connect

- Facebook (http://www.facebook.com/NRCC)
- Twitter (http://www.twitter.com/nrcc)
- YouTube (http://www.youtube.com/lhenrec)
- · Tumbir (http://rircc.tumbir.com/)
- · Pinterest (http://pinterest.com/thenrcc/)

Contributions to the National Republican Congressional Committee are not deductible as charitable contributions for Federal Income lax purposes.

Paid for by the National Republican Congressional Committee and not authorized by any candidate or candidate's committee, www.nrcc.org (http://www.nrcc.org/)

# NRCC

and Salary and the

- · About (http://www.nrcc.olg/about/)
- Blog (http://www.nrcc.org/blog/)
- · Videos (http://www.nrcc.org/videos/)
- · Store (https://www.nrcc.org/store/)
- . Contribute (https://www.nrcc.org/contribute/)

# E | 00

SHARE

tp://www.facebook.com/sharer.php?u=http%3A%2F%2Fwww.nr

www.ncc.ong%2F2013%2F10%2F24%2Fnto-launche

-website-new-jersey-congressional-candidate-bill-hughes-ir%2F) 0 shares



(littip://twitter.com/share?url≃http%3A%

2F%2Fwww.nrcc.org%2F2013%2F10%2F24%2Fnndr-launchigs-wabsite-new-jersey-congressional-candidate-bill-hughes-jr% 2F&text=NRCC%20Launchies%2gWebsite%20Against%20New%20Jersey%20Congressional%20Cendidate%20Eill%20Hughes,%

20Jr.&via=nrcc) 11 tweets

(http://www.nrcc.org/category/blog)

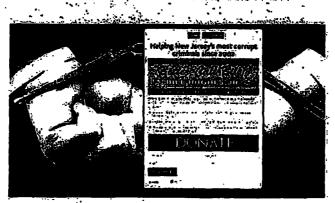
# NRCC Launches Website Against New Jersey Congressional Candidate Bill Hughes, Jr. NRCC (http://www.nrcc.org/author/admin/) | October 24th, 2013

Website Highlights Hughes Jr.'s Career Fighling for the Corrupt and Powerful

The National Republican Congressional Committee launched a new website and targeted search ads today egainst recently announced New Jersey congressional candidate Bill Hughes, Jr. The website, which can be seen here https://www.nrcc.org/bill-hughes-jr-congress/), highlights Hughes Jr.'s career of fighting to keep some of New Jersey's worst criminals out of fall.

The targeted search ads will direct people searching for more information about Hughes, Jr. to the NRCC's website which will give the viewer a more accurate picture of Hughes Jr.'s career siding with some of the worst of the worst criminals – a career which includes representing a mobster, a crooked cop, a child pomographer, and an accused human trafficker.

"Bill Hughes Jr. has spent the past decade making big money representing some of the werst criminals in New Jersey – whether it be a dirty cop, an accused human trafficker, corrupt public official, a mobster; or even a child pomographer, said NRCC Spokesman lan Prior. "In fact, Hughes Jr. even boasts on his law firm website about all the light conteness that he helped get for convicted criminals. The choice in this election will be very clear – a bipartisan leader and public servant like Congressimen Collored, or a criminal defense lawyer like Hughes Jr. who specialized in standing up for the rich, powerful, and criminally corrupt."



Bill Hughes Jr. for Congress (http://billhughesinforcongress.com/)



(https://www.nrcc.org/store/reagan-bush-84-campaign-shirt/?

utm\_source=nrccsidebar&utm\_medium=website&utm\_campaign=ReaganBushShirt\_sidebar\_s\_v1)

#### **Trending**



(http://www.hrcc.org/2014/05/13/one-gif-house-democrat-will-remind-good-

hygiene/)Watch This Democrat Congressman Eat His Earwax (http://www.nrcc.org/2014/05/13/one-gif-house-democrat-will-remind-good-hygiene/)



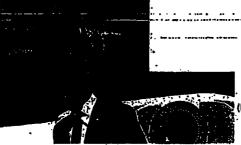
(http://www.nrcc.org/2014/05/12/nrcc-announces-first-round-young-gun-

candidates/)NRCC Announces First Round of Young Gun Candidates (http://www.nrcc.org/2014/05/12/nrcc-announces-first-round-young-gun-candidates/)



(http://www.nrcc.org/2014/05/07/latest-story-epa-porn-watching-employee-

outrageous/)This Latest Story About What The EPA Did To its Porn-Watching Employee is Outrageous (http://www.nrcc.org/2014/05/07/latest-story-epa-porn-watching-employee-outrageous/)



(http://www.nrcc.org/2014/05/08/one-headline-shows-exactly-whats-stake-

november/)This One Headline Shows Exectly What's At Stake In November (http://www.nrcc.org/2014/05/08/one-headline-shows-exectly-whats-stake-november/)



(http://www.nrcc.org/2014/05/13/8-tweets-show-awful-day-democrate/)Here

Are 10 Tweets That Show What An Awful Day Democrats Are Having (http://www.nrcc.org/2014/05/13/8-tweets-show-awful-day-democrats/)



(http://www.nrcc.org/2014/05/13/nrcc-memo-west-virginia-primary-results-

2/)NRCC Memo: West Virginia Primary Results (http://www.nrcc.org/2014/05/13/nrcc-memo-west-virginia-primary-results-2/) (https://www.facebook.com/NRCC) (https://www.facebook.com/NRCC) (https://www.facebook.com/NRCC)

### CONTRIBUTE (https://www.nrcc.org/contribute/)



(http://www.nrcc.org/home) 320 First St., SE Washington, DC 20003 202-479-7000

- Privacy Policy (http://www.nrcc.org/privacy-policy)
- Copyright © 2014. All Rights Reserved.
- Blog (http://www.nrcc.org/blog/)
- Blog (default) (http://www.nrcc.org/category/blog/)
- Press Releases (http://www.nrcc.org/category/press-release/)
- Rapid Response (http://www.nrco.org/category/rapid-response/)
- Polling Memos (http://www.nrcc.org/category/polling-memos/)
- Photos (http://www.nrcc.org/category/photo/)
- Videos (http://www.nrcc.org/category/video/)
- About (http://www.nrcc.org/about/)
- Intern Application (http://www.nrcc.org/intern-application/)
- Digital internship (http://www.nrcc.org/digital-internship/)
- Membership (http://www.nrcc.org/membership/)
- . Sustaining Members and Chalman's Council
- Speaker's Circle
- Steering Committee (http://www.nrcc.org/membership/steering-committee/)
- · Chairman's Club (http://www.nrcc.org/membership/chairmans-club/)
- House Council (http://www.nrcc.org/membership/house-council/)
- Congressional Forum (http://www.nrcc.org/membership/congressional-forum/)
- · Videos (http://www.nrcc.org/videos/)
- · Connect
  - Facebook (http://www.facebook.com/NRCC)
  - Twitter (http://www.twitter.com/nrcc)
  - YouTube (http://www.youtube.com/thenroc)
  - . Tumbir (http://nrcc.tumbir.com/)
  - Pinterest (http://pinterest.com/thenroc/)

Contributions to the National Republican Contributional Committee are not deductible as charitable contributions for Federal Income tax purposes.

Paid for by the National Republican Congressional Committee and not authorized by any candidate or candidate's committee. www.nrcc.org (http://www.nrcc.org/)

<img src="//tags.wdsvc.net/noscript?id=3288&wdsim=&wdsoi=&wdsoa=" style="display:none"/>



- · About (http://www.nrcc.org/about/)
- · Blog (http://www.nrcc.org/blog/)
- Videos (http://www.nrcc.org/videos/)
- · Store (https://www.nrcc.org/store/)
- Contribute (https://www.nrcc.org/contribute/)

# Blog



(http://www.facebook.com/sharer.php?u=http%3/%2F%2Fwww.nrcc.org%2F2014%2F01%2F13%2Fnrcc.launche

-website-new-jersey-congressional-candidate-bill-hughes-jr-2%2F) 0 shares



(http://lwitter.com/share?url=http%

3A%2F%2Fwww.nrcc.org%2F2014%2F01%2F13%2Fnrcc-launches-website-new-jersey-congressional-candidate-bill-hughes-jr-2% 2F&text=NRCC%20Launches%20Website%20Against%20New%20Jersey%20Congressional%20Candidate%20Bill%20Hughes.% 20Jr.&via=nrcc) 0 tweets

(http://www.nrcc.org/category/blog)

# NRCC Launches Website Against New Jersey Congressional Candidate Bill Hughes, Jr. Ian Prior (http://www.nrcc.org/author/lprior/) | January 13th, 2014

The National Republican Congressional Committee launched a new website and targeted search ads today against recently announced New Jersey congressional candidate Bill Hughes, Jr. The website, which can be seen here https://www.nrcc.org/bill-hughes-jr-congress/ (https://www.nrcc.org/bill-hughes-jr-congress/), highlights Hughes Jr.'s career of fighting to keep some of New Jersey's worst-criminals out of jail.

The targeted search ads will direct people searching for more information about Hughes, Jr. to the NRCC's website which will give the viewer a more accurate picture of Hughes Jr.'s career siding with some of the worst of the worst criminals – a career which includes representing a mobster, a crooked cop, a child pomographer, and an accused human trafficker.

"Bill Hughes Jr. has spent the past decade making big money representing some of the worst criminals in New Jersey – whether it be a dirty cop, an accused human trafficker, corrupt public official, a mobster, or even a child pomographer," said NRCC Spokesman lan Prior. "In fact, Hughes Jr. even boasts on his law firm wabsite about all the light sontences that he helped get for convicted criminals. The choice in this election will be very clear – a bipartisan leader and public servant like Congressman LoBiondo, or a criminal defense lawyer like Hughes Jr. who specialized in standing up for the rich, powerful, and criminally corrupt."

Check out the site by clicking on the screen shot below:

Bill Hughes Jr. For Congress (http://billhughes/rforcongress.com/)



(https://www.nrcc.orp/store/reagen-bush-84-campaign-shirt/?

utm\_source=nrccsidebar&utm\_medium=website&utm\_campaign=ReaganBushShirt\_sidebar\_s\_v1)

### **Trending**



(http://www.nrcc.org/2014/05/13/one-gif-house-democrat-will-remind-good-

hygiene/)Watch This Democrat Congressman Eat His Earwax (http://www.nrcc.org/2014/05/13/one-gif-house-democrat-will-remind-good-hygiene/)



(hillp://www.nrcc.org/2014/05/12/nrcc-announces-first-round-young-gun-



http://www.nrcc.org/2014/05/07/latest-story-eps-porn-watching-employee-

outrageous/)This Letest Story About What The EPA Did To its Pom-Watching Employee is Outrageous (http://www.nrcc.org/2014/05/07/latest-story-epa-porn-watching-employee-outrageous/)



(http://www.nrcc.org/2014/05/08/one-headline-shows-exactly-whats-stake-

november/)This One Headline Shows Exactly What's At Stake in November (http://www.nrcc.org/2014/05/08/one-headline-shows-exactly-whats-stake-november/)



(http://www.nrcc.org/2014/05/13/8-tweets-show-awful-day-democrats/)Here

Are 10 Tweets That Show What An Awful Day Democrats Are Having (http://www.nrcc.org/2014/05/13/8-tweets-show-swful-day-democrats/)



(http://www.nrcc.org/2014/05/13/nrcc-memo-west-virginia-primary-results-

2/)NRCC Memo: West Virginia Primary Results (http://www.nrcc.org/2014/05/13/nrcc-memo-west-virginia-primary-results-2/) (https://www.facebook.com/NRCC) (https://www.youtube.com/user/TheNRCC/festured)

CONTRIBUTE (https://www.nrcc.org/contribute/)



(http://www.nrcc.org/home) 320 First St., SE Washington, DC 20003 202-479-7000

Privacy Policy (http://www.nrcc.org/privacy-policy) | Contact Us (http://www.nrcc.org/contact)

Copyright © 2014, All Rights Reserved.

- log (http://www.nrcc.org/blog/)

- Biog (default) (http://www.nrcc.org/category/piog/)
   Press:Releases (http://www.nrcc.org/category/press-release/)
   Rapid Response (http://www.nrcc.org/category/rapid-response/)
   Polling Memos (http://www.nrcc.org/category/polling-memos/)
- . Photos (http://www.nrcc.org/category/photo/)
- Videos (http://www.nrcc.org/category/video/)
- About (http://www.nrcc.org/about/)
  Intern:Application (http://www.nrcc.org/intern-application/)

- Videos (http://www.nrcc.org/videos/)
- Connect
  - Facebook (http://www.facebook.com/NRCC)
  - Twitter (http://www.twitter.com/nrcc)
  - YouTube (http://www.youtube.com/thenroc)
  - Tumbir (http://nrcc.tumbir.com/)
  - Pinterest (http://pinterest.com/thenrcc/)

Contributions to the National Republican Congressional Committee are not deductible as charitable contributions for Federal income tax purposes.

Paid for by the National Republican Congressional Committee and not authorized by any candidate or candidate's committee. www.nrcc.org (http://www.nrcc.org/)

<img src="//tags.wdsvc.nat/noscript?id=3288&wdsim=&wdsof=&wdsoa=" style="display:none"/>



November 06, 2013, 06:00 am

# NRCC hits top Democratic targets with attack microsites

The National Republican Congressional Committee (NRCC) is launching stand-alone attack sites hitting the seven Democratic targets in its Red Zone program, a GOP designation for Democrats' most vulnerable incumbents.

The Rod Zone condidates are Reps. Ann Kirkpatrick (Art.), Ron Barber (Art.). John Barrow (Ge.), Collin Paterson (Minn.). Mike McIntyre (N.C.), Jim Mattiegon (Chan) and Nick Rehall (W.Va.), who are all running for replection in districts won by Republicans in the past three presidential elections.

All seven are austre GOP targets, who have repeatedly managed to else out restection was despite representing tough districts.

Democrats need 17 seats to regain the majority, a tall order for any party but a particularly difficult get in an off-year when the party holding the White House normally loses seats.

But Republicans aren't taking those 17 seats for granted, and their Red Zone program is an opportunity for the GOP to play offense and work to expand their already considerable margin.

The sites are all labeled like traditional campaign sites — AnnKirkpatrick.com is one; MathesonForUtah.com another — opening the possibility that a voter could stumble upon them while seeking information on a given candidate.

And each includes details on the candidates' voting history and Republican attack lines.

"Ron Barber is running for Congress because he is more interested in keeping his job than making sure there are jobs for you and your family," reads the alte hitting Barber.

The sites all provide the option for a user to donate to the NRCC and sign up to the committee's mailing list.

NRCC Communications Director Andrea Bozek said the sites are meant to provide the truth about Democratic "trauds."

"These Democrats are frauds and don't fit their districts," she said in a statement. "They continuously say one thing back home, then vote with Nancy Pelosi in Washington. With this new NRCC campaign, voters will finally learn the truth about these two-faced politicians."

TAGS: John Barrow, Ann Kirkpatrick, Ron Barber, Mike McIntyre, Jim Matheaon, Nick Rahali, Colin Peterson, NRCC Red Zone, House races 2014

Like Share Tweet 19

The Hill 1625 K Street, NW Suite 900 Washington DC 20006 | 202-628-6500 tel | 202-628-6503 tax
The contents of this site are ©2014 Capitol Hill Publishing Corp., a subsidiary of News Communications, Inc.